

AO 91 (Rev. 11/11) Criminal Complaint

**FILED**

## UNITED STATES DISTRICT COURT

for the  
Western District of Texas

OCT 16 2024

CLERK, U.S. DISTRICT COURT  
WESTERN DISTRICT OF TEXAS  
BY EB  
DEPUTY CLERK

United States of America )

v. )

Case No. EP-24-M-4337-RFC

Vilma Haidee REGALADO-Ramos )

Defendant(s)

## CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of October 14, 2024 in the county of El Paso in the  
Western District of Texas, the defendant(s) violated:

## Code Section

8 U.S.C. 1326(a)

## Offense Description

an alien, who had previously been excluded, deported, and removed from the United States, attempted to enter, entered, and was found in the United States, without having previously received consent to reapply for admission from the Attorney General of the United States and the Secretary of Homeland Security, the successor pursuant to Title 6, United States Code, Sections 202(3), 202(4) and 557.

This criminal complaint is based on these facts:

☒ Continued on the attached sheet.Oath Telephonically Sworn  
At 11:34 AM  
Fed.R.Crim.P.4.1(b)(2)(A)


Sworn to before me and signed in my presence.

Date: October 16, 2024City and state: El Paso, Texas

Complainant's signature

Erika K. Robles

CBPO-Enforcement

  
Judge's signature

Robert F. Castaneda

U.S Magistrate Judge

## **FACTS**

That on or about October 14, 2024, the DEFENDANT, Vilma Haidee REGALADO-Ramos, a citizen of El Salvador, attempted to enter the United States by eluding inspection by Customs and Border Protection (CBP) Officers via southbound pedestrian walkway at the Paso del Norte Port of Entry (POE) in El Paso, Texas located in the Western District of Texas.

Customs and Border Protection Officer (CBPO) H. Lopez, D. Rodriguez and D. Blaney were in secondary at the Paso del Norte POE when CBPO H. Lopez noticed the DEFENDANT and another female walking north on the southbound walkway. CBPO Lopez attempted to scare them back to Mexico by flashing them with his flashlight, but the DEFENDANT and the other female started running north into the United States. CBPO Lopez, Rodriguez and Blaney started running towards the gate that opens from vehicular lanes to the southbound walkway and saw the DEFENDANT and the other female running away from the officers into the United States as CBPO Rodriguez was telling them to stop. CBPO Rodriguez and CBPO Blaney reached the DEFENDANT and other female and apprehended and secure them. The DEFENDANT and other female were escorted into Passport Control Secondary (PCS) for further processing.

In PCS, the DEFENDANT was served Form I-214 Warning as to Rights (Spanish Version) which she read, understood, signed, and waived her right to legal counsel.

The DEFENDANT's database queries revealed she was previously removed from the United States on or about 05/30/2024, 02/23/2024, and 05/17/2023 to El Salvador.

During a sworn statement, the DEFENDANT admitted that her intent was to enter the United States and travel to Arkansas to re unite with her boyfriend and seek employment. The DEFENDANT admitted not having legal documents that would allow her to enter, work or reside in the United States. The DEFENDANT admitted she was aware that crossing without being inspected was illegal.

Database records indicate the DEFENDANT has not applied for, nor received permission from the U.S. Attorney General or the Secretary of Homeland Security to reapply for admission into the United States. Further queries revealed the DEFENDANT is not in possession of any legal documents in which to enter, reside or seek employment in the United States.

Because this Affidavit is being submitted for the limited purpose of establishing probable cause as set forth herein, I have not included each and every fact known to me concerning this investigation.

### **Immigration Record**

On or about 05/30/2024 Removed from Alexandria, LA to El Salvador.

On or about 02/23/2024 Removed from Alexandria, LA to El Salvador.

On or about 05/17/2023 Removed from Harlingen, TX to El Salvador.

### **Criminal Record**

None can be established at this time.